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MAY 28 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of:

Replacement of Part 90 by  
Part 88 to Revise the Private  
Land Mobile Radio Services and  
Modify the Policies Governing  
Them

PR Docket 92-235

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FCC MAIL BRANCH

COMMENTS OF THE WASHINGTON STATE PATROL

The Washington State Patrol (WSP) thanks the Commission for the opportunity to comment on this Docket. The WSP is a state police agency which consists of over 1000 sworn officers and over 1000 civilian personnel. It is responsible for a land area of 66,570 square miles and a population of 5 million. The WSP operates more than 2000 mobile radios and 1000 portable radios on 15 VHF frequencies and 2 UHF frequency pairs. The WSP provides communications services to many other state agencies and supports functions of statewide criminal justice agencies, i.e., crime laboratories, telecommunications networks, and computer files.

We support the positions taken by The Associated Public-Safety Communications Officers (APCO) and the Land Mobile Communication Council (LMCC) in total.

As presently written, Part 88 would be devastating to our communications system. Of most concern are (1) the 5 KHz spacing at 150 MHz; (2) the ERP-HAAT limits; (3) the loss of spectrum at 150 MHz and (4) the service consolidation. We support all of APCO's responses, but will only comment on these four (4) items.

The 5 KHz spacing proposed in part 88 would force us to use Amplitude Compandered Single Sideband (ACSB). Only this technology can presently fit in this spacing. It will be sometime, if ever, that digital radios can be built with this spacing.

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We have tested ACSB and found it substandard to the FM system we are presently using. It is particularly poor when the vehicle is moving, which our agency vehicles are usually doing when emergencies occur. This is not an acceptable technology for this agency, nor do we believe any public safety agency. A move to 12.5 KHz with a future move to 6.25 KHz is the only acceptable migration path for public safety. We must be able to communicate with federal law enforcement agencies. The 5 KHz spacing would prevent this from occurring.

The ERP-HAAT limits proposed by part 88 are not practical. The limitations proposed would destroy the WSP statewide communications system. We could quote some huge costs associated with this limitation, but that would not paint a correct picture. Sites can neither be obtained nor developed in this day and age. The result of this limitation would be huge holes in our coverage; therefore, lives could be lost with no gain in frequency efficiency. The result will obviously be a decrease in spectrum efficiency with increased peril to the officer on the road.

The Washington State Patrol operates its system in the 150 MHz band. We are extremely short of spectrum in the Seattle area with over 400 mobiles on two simplex channels. We don't understand why the FCC would propose to give 1/3 of the spectrum assigned to public safety away to commercial interests. We desperately need that spectrum, and we need paired channels at 150 MHz as are provided at 450 MHz and 800 MHz. Also needed are channels set aside for wide area statewide use. It was a grave disservice when the FCC gave up protecting the few state police channels at 150 MHz.

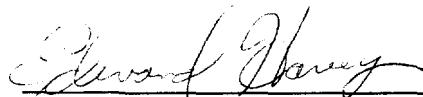
The final concern we would like to address is the proposal to consolidate all of the public safety services while continuing to maintain all of the coordinators. This will cause a degradation in our service. We are concerned that the other coordinators will not know how to coordinate police channels. If police channels are not protected, it will have grave results.

We recommend the police radio service continue with its present block or consider only one coordinator. That coordinator must be APCO.

There are a number of other areas with which we are concerned; however, APCO and LMCC covered these adequately in their comments.

We thank you for the opportunity to comment and implore you to heed our concerns.

Respectively submitted,



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